



October 13, 2022

VIA ECF

Honorable James M. Wicks, USMJ
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Martinez v. Feliks & Son Storage Tank Corp. et al.*, Case No. 21-cv-03613 (GRB)
(JMW)

Dear Judge Wicks:

Our office represents the defendants, Feliks & Son Storage Tank Corp. and Feliks & Son Services LLC, in the above referenced matter. This letter is written to respectfully determine whether the presence of counsel is sufficient for the upcoming Traverse Hearing/Appearance scheduled for October 21, 2022. In the event that the Court also intends to hear testimony from witnesses, our office would like to confirm as much so that arrangements may be made to have witnesses available in court for the hearing.

Thank you for your time and attention on this matter.

Respectfully submitted,

Sofya Uvaydov

CC: All counsel of record via ECF

COFFEY MODICA O'MEARA CAPOWSKI